Exhibit 2

Excerpt of the Deposition of Tobias Woolridge, dated January 25, 2024

Filed Under Seal

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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EVERETT BLOOM, an individual on behalf of himself, the general public, and those similarly situated,

Plaintiff,

vs.

Case No.:
2:22-cv-00412-RFB-BNW

ZUFFA, LLC,

Defendants.
_____/

HIGHLY CONFIDENTIAL

*** HIGHLY CONFIDENTIAL ***
Remote Deposition Of
TOBIAS WOOLDRIDGE
Thursday, January 25, 2024

CERTIFIED COPY

STENOGRAPHICALLY REPORTED
BY: DEBORAH FUQUA, CSR #12948
CERTIFIED STENOGRAPHIC REPORTER

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150 Sutter Street, P.O. Box 538
San Francisco, California 94105
(415) 398-1889
nogara.reporting@gmail.com

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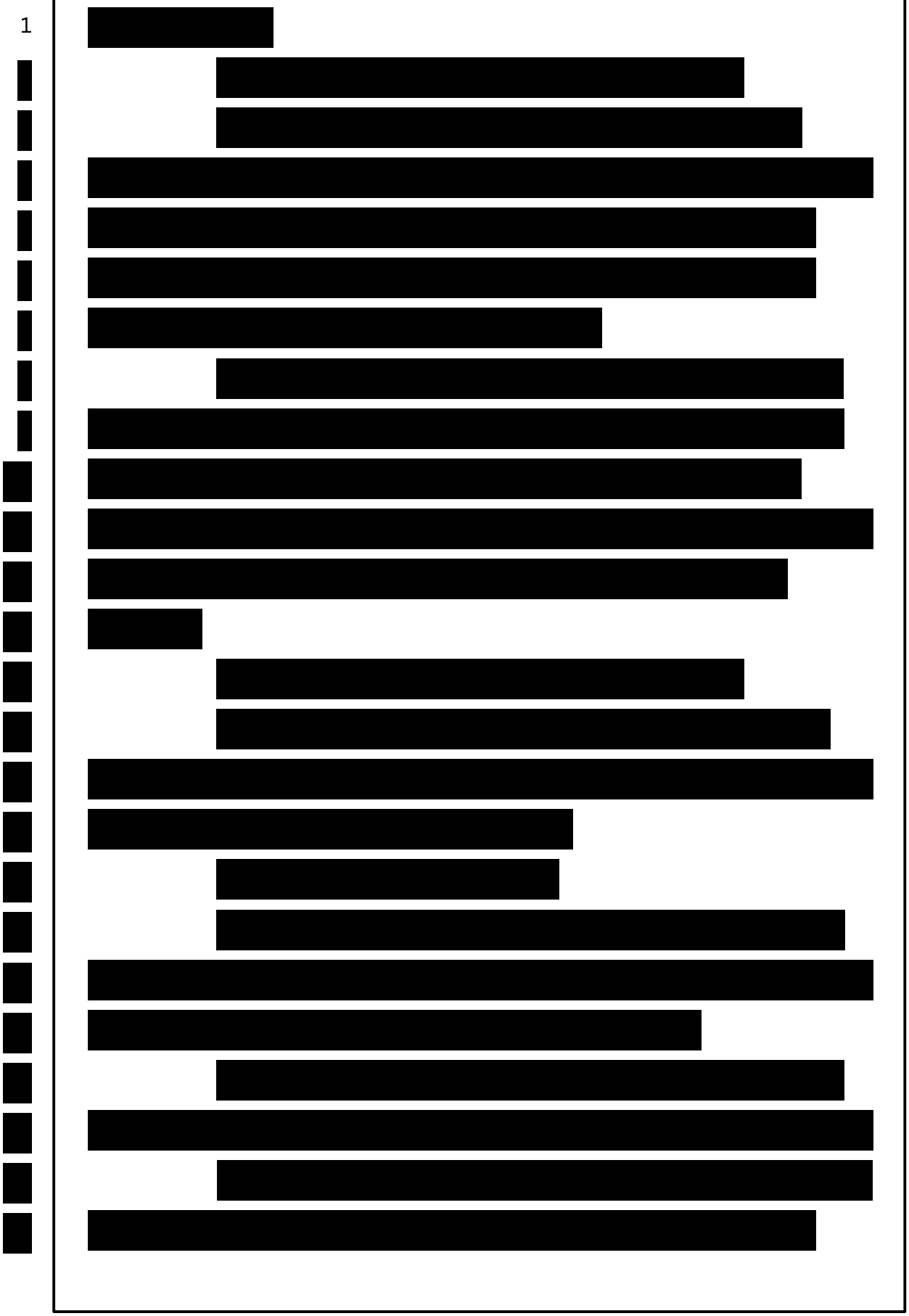

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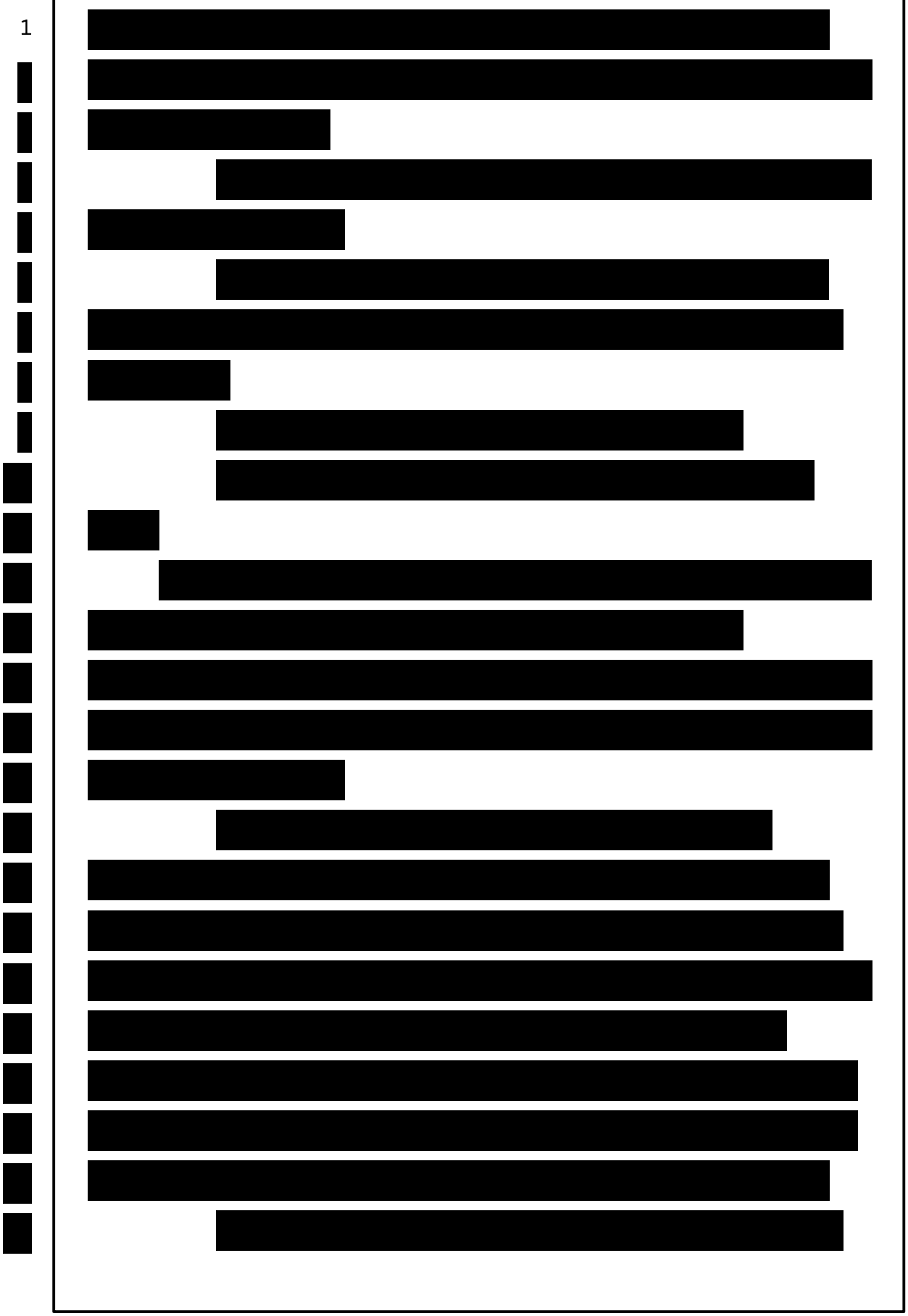
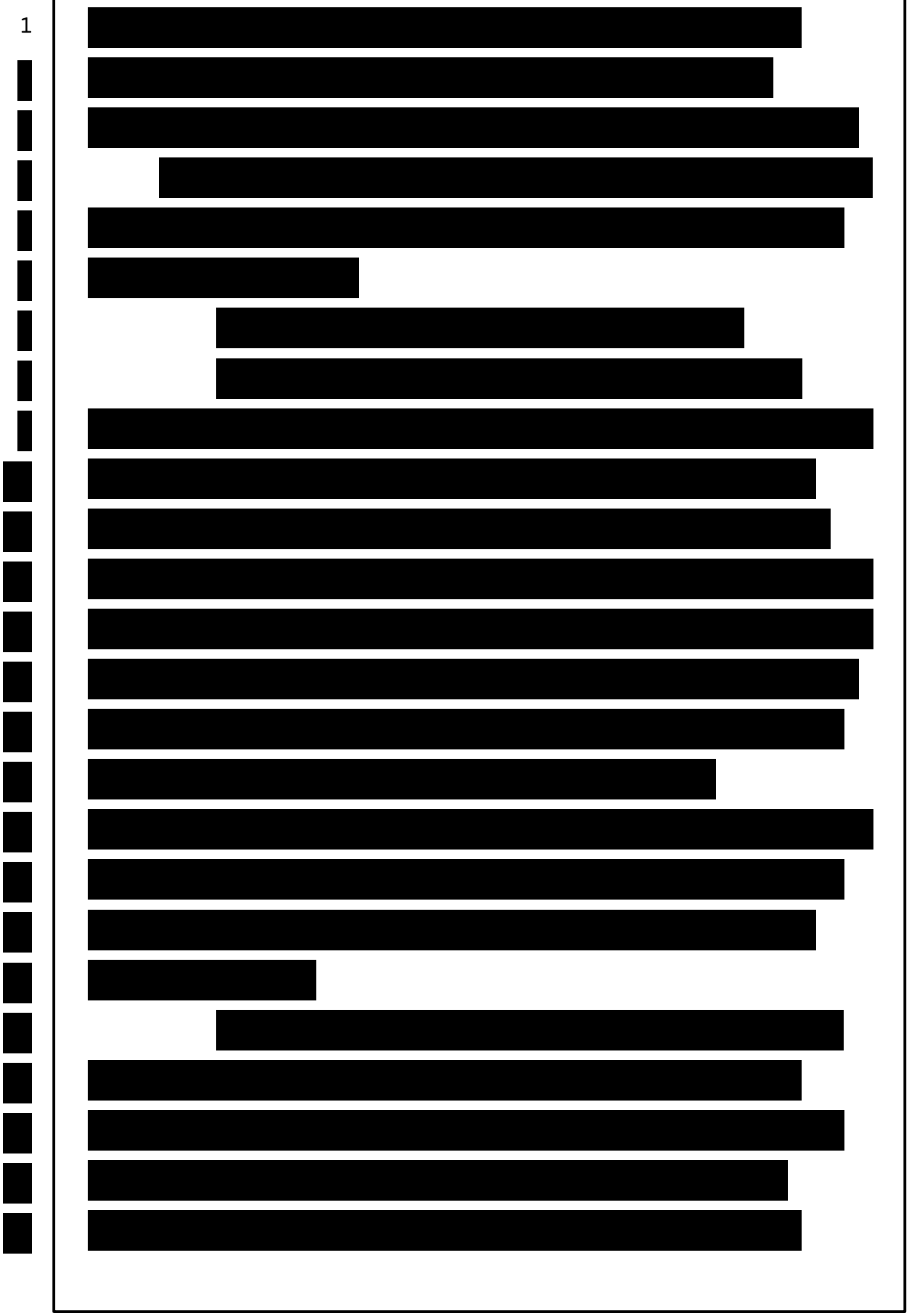
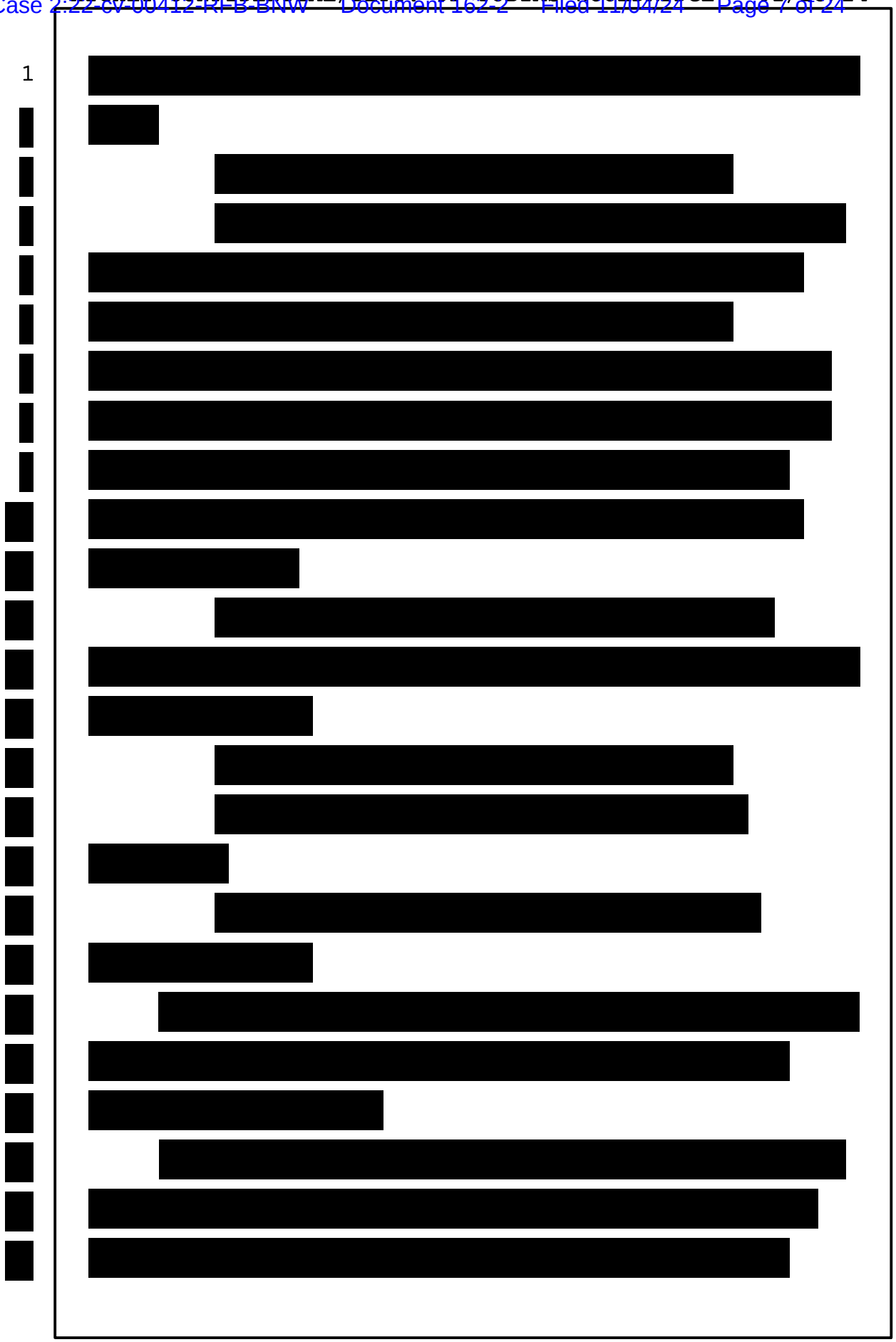
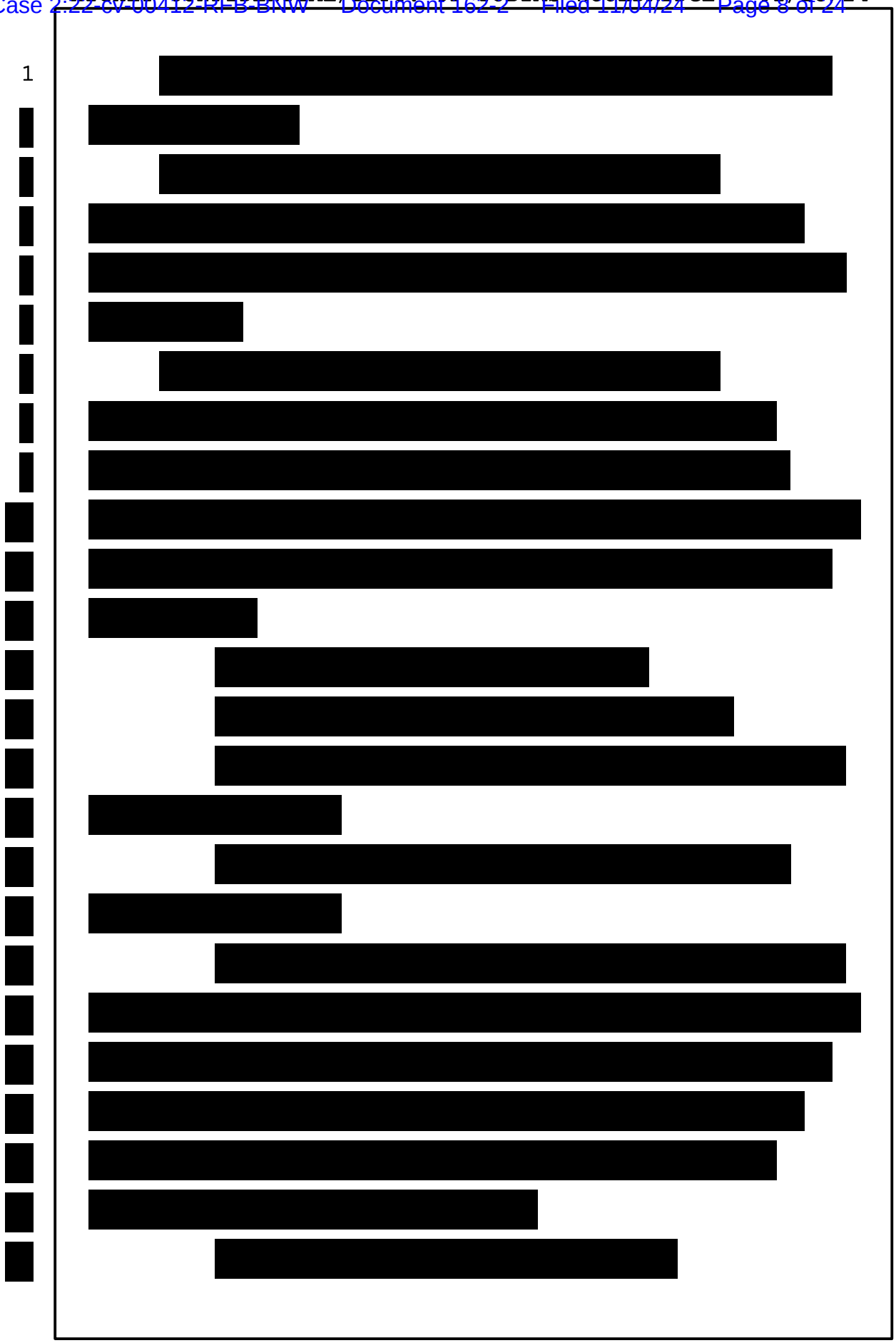






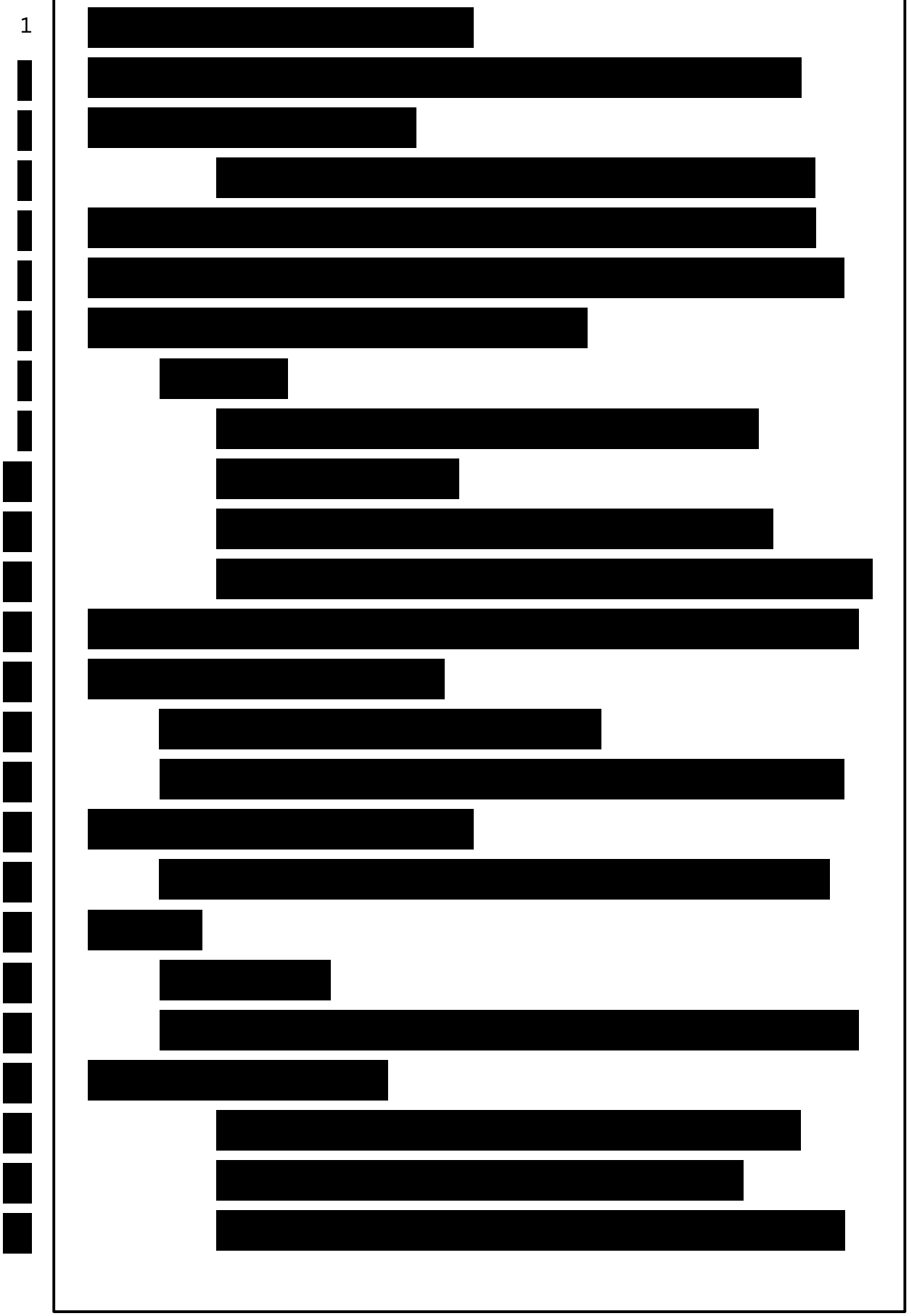


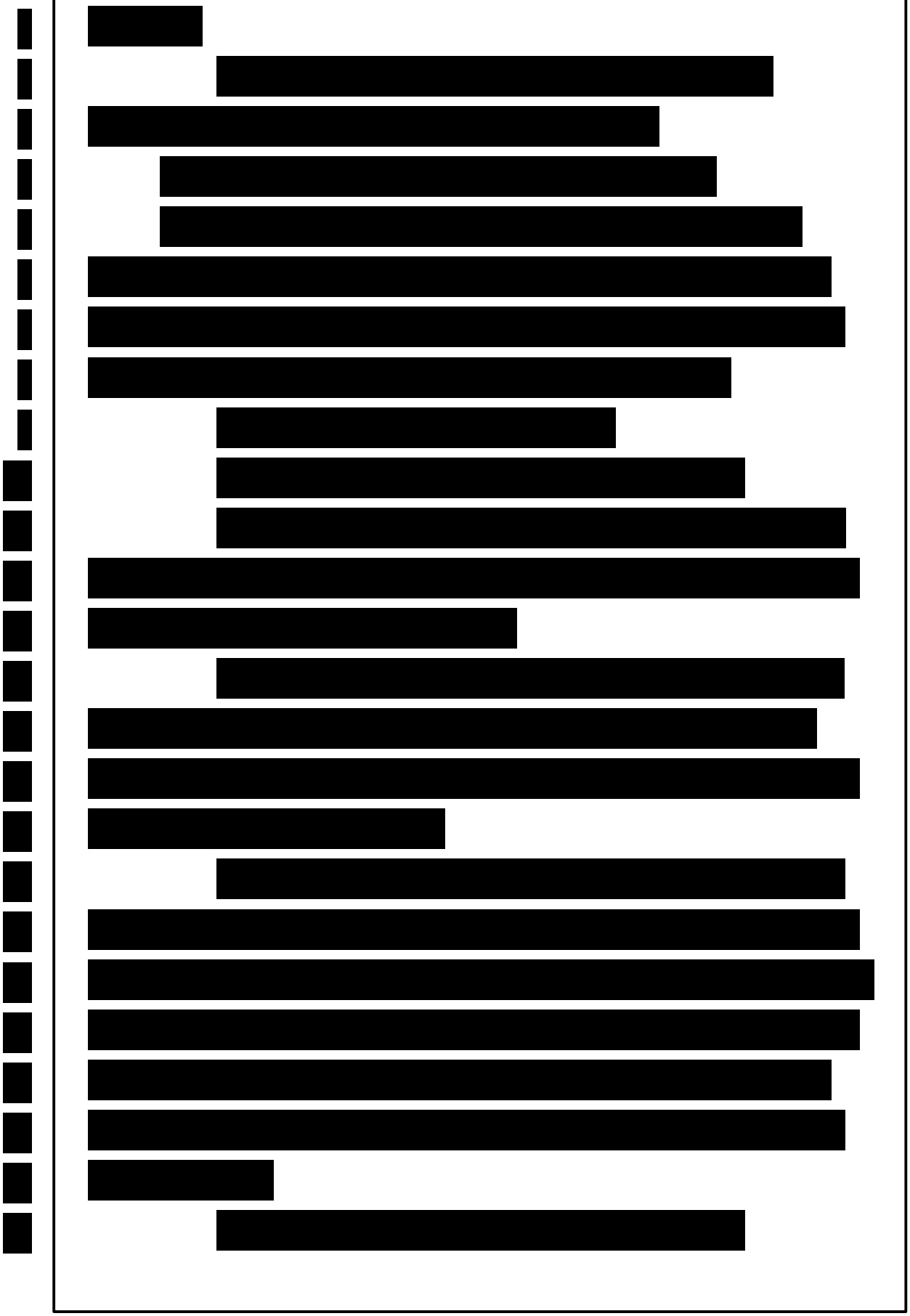
[redacted]

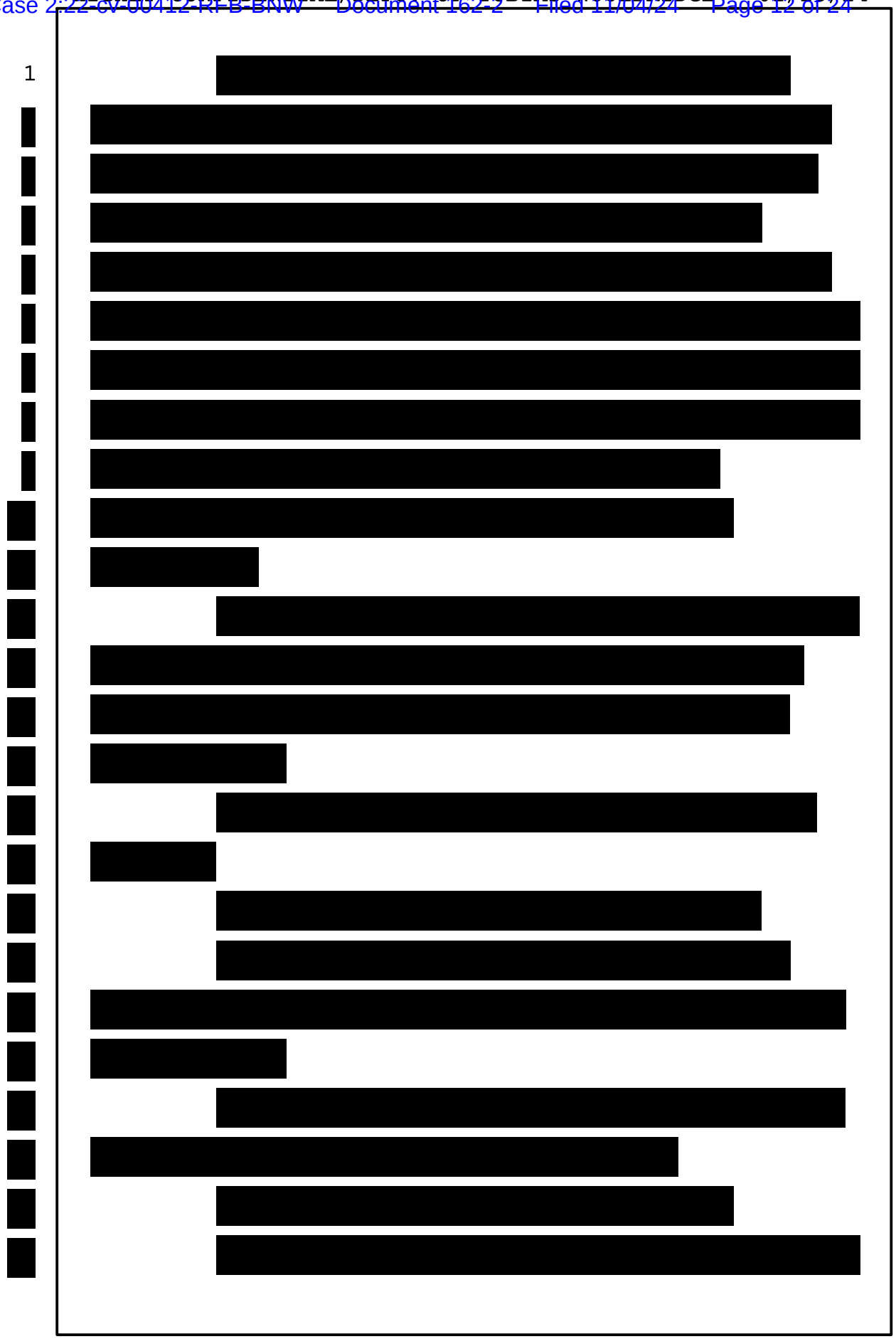
ATTORNEY PATEK: Q. Okay. So when the Pixel event data is received, it has the integer -- well, assuming that the c_user cookie was transmitted as part of it, it has the integer value of the Facebook ID present in the Pixel event data, correct?

ATTORNEY RABBANI: Objection to form.

THE WITNESS: I don't know if I would characterize the c_user cookie as part of the Pixel event data necessarily.







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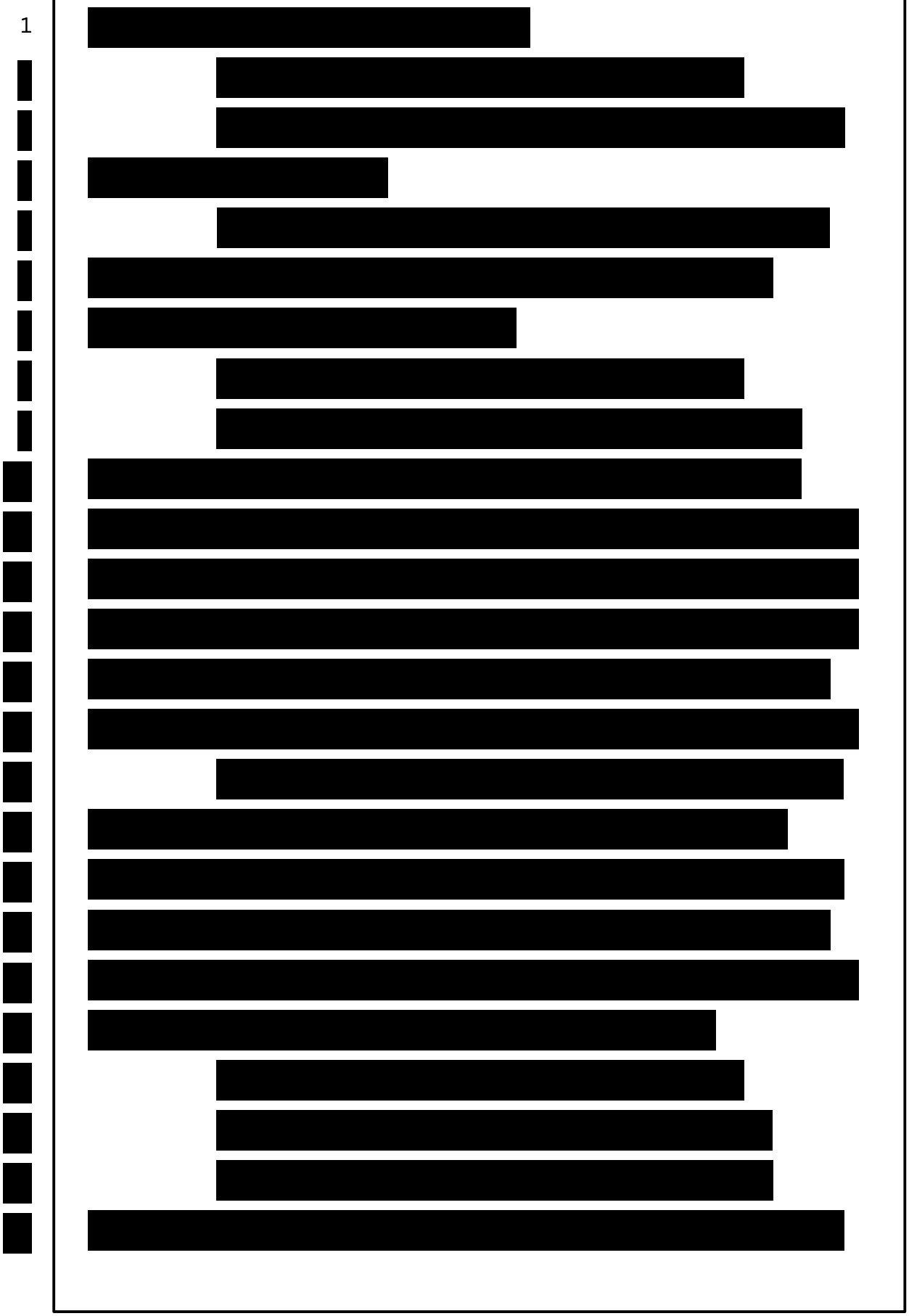
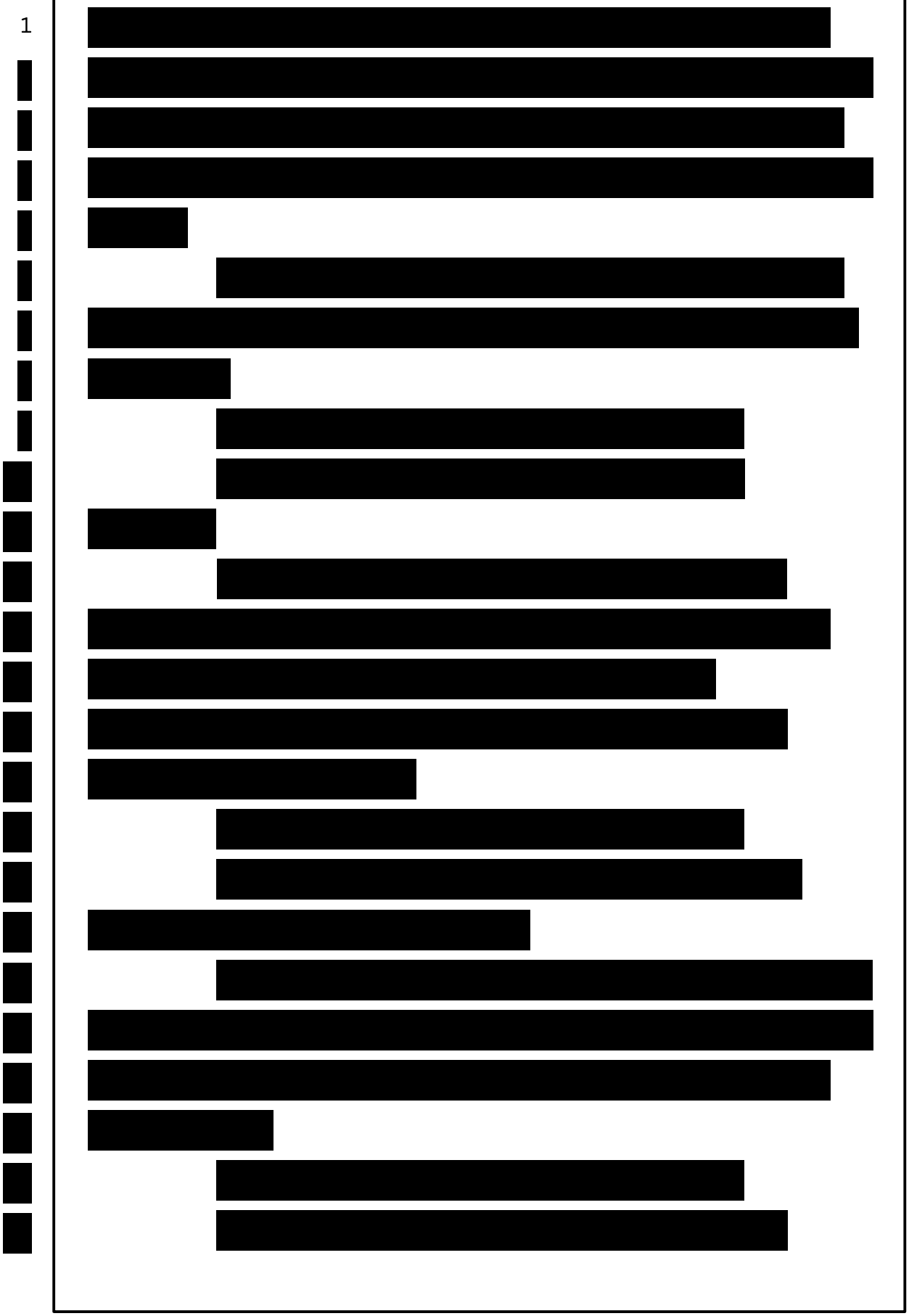
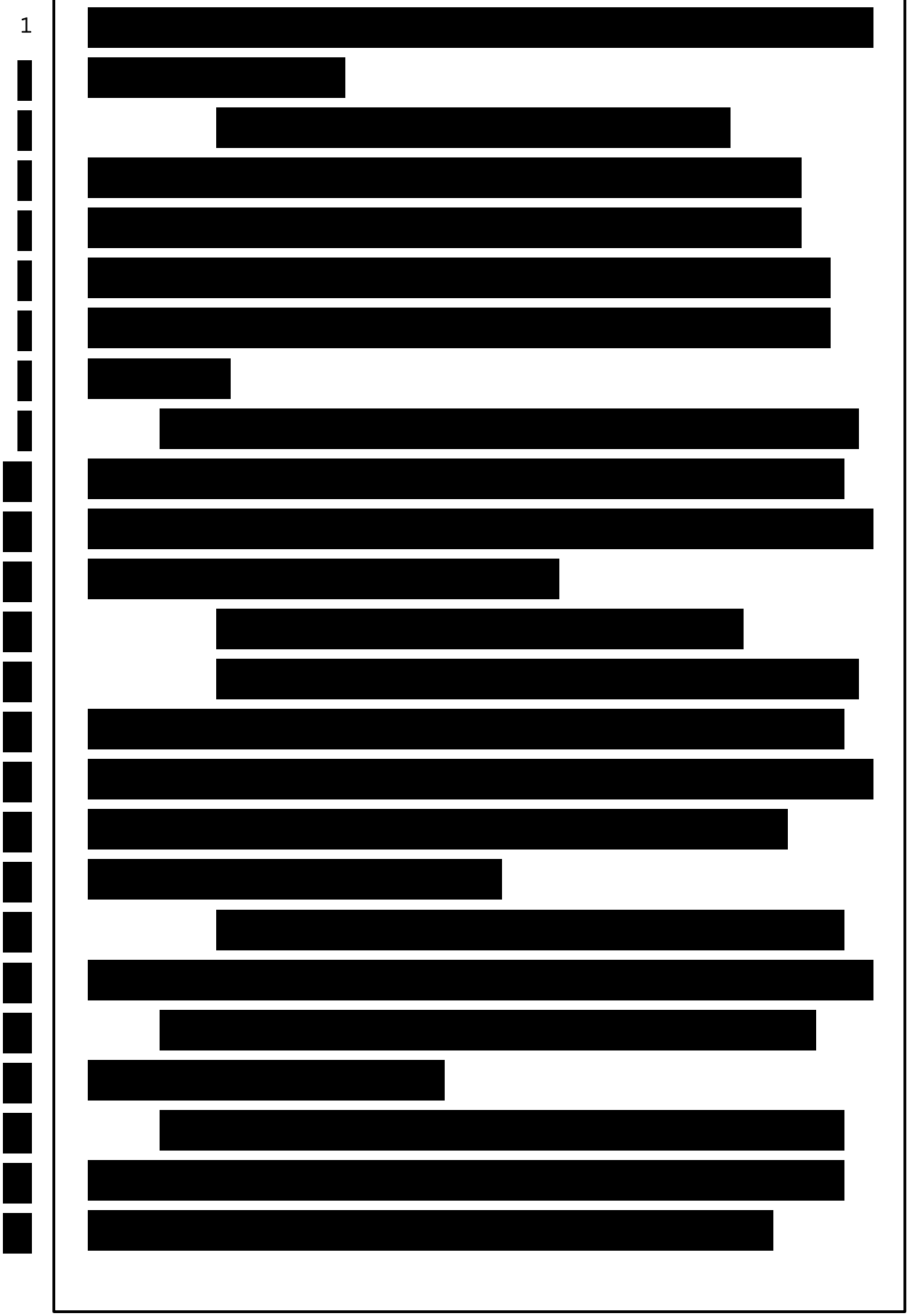
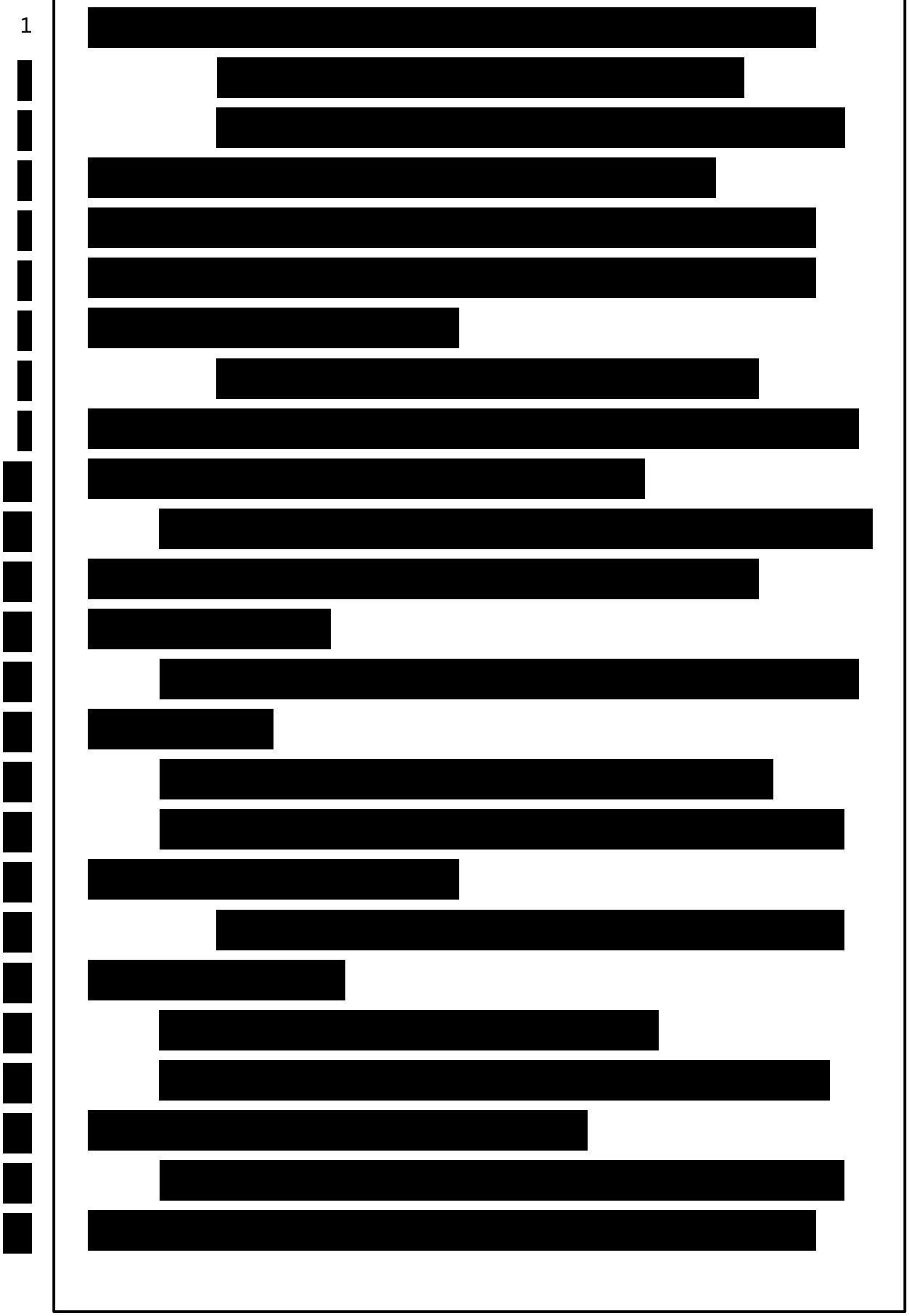
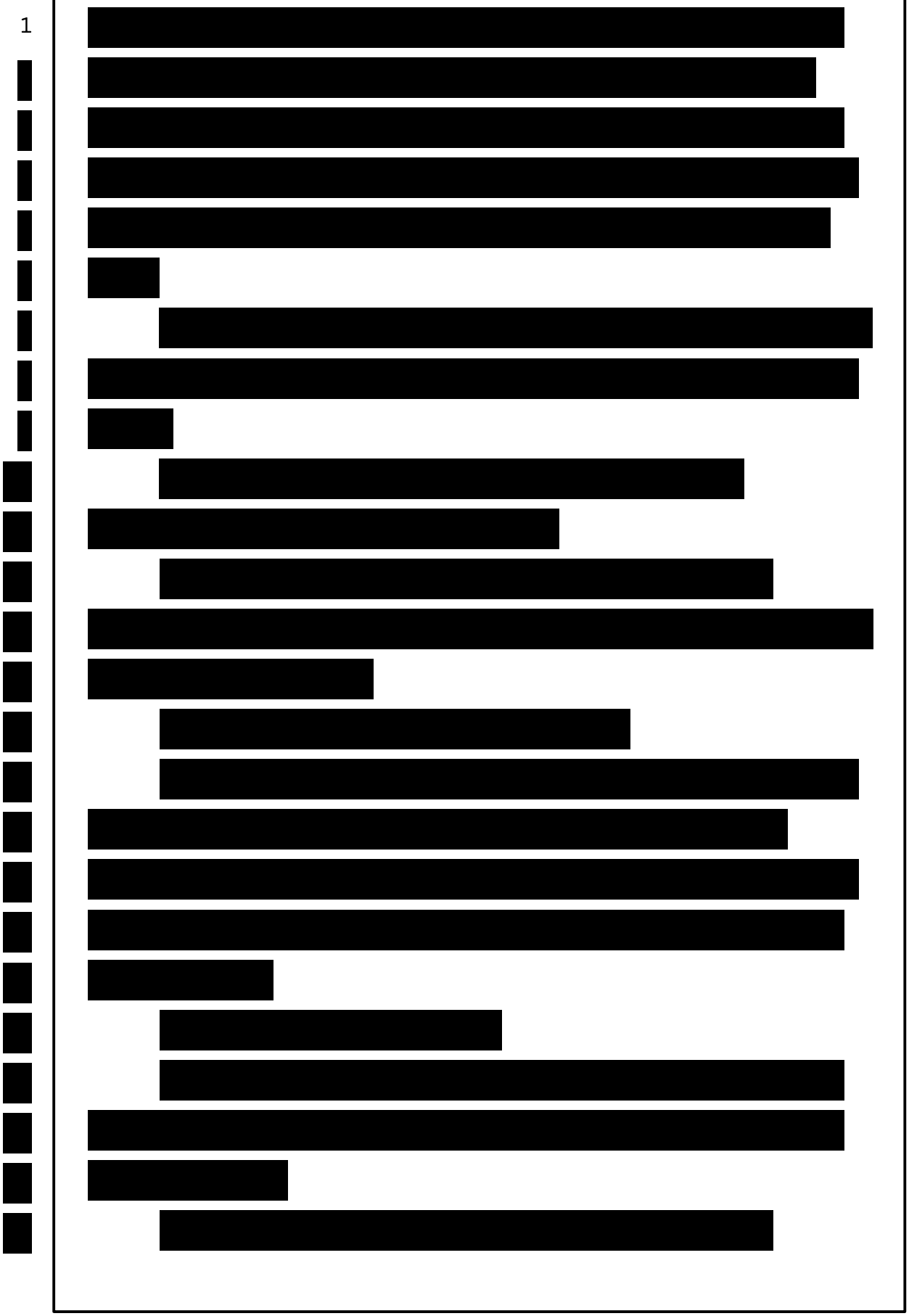
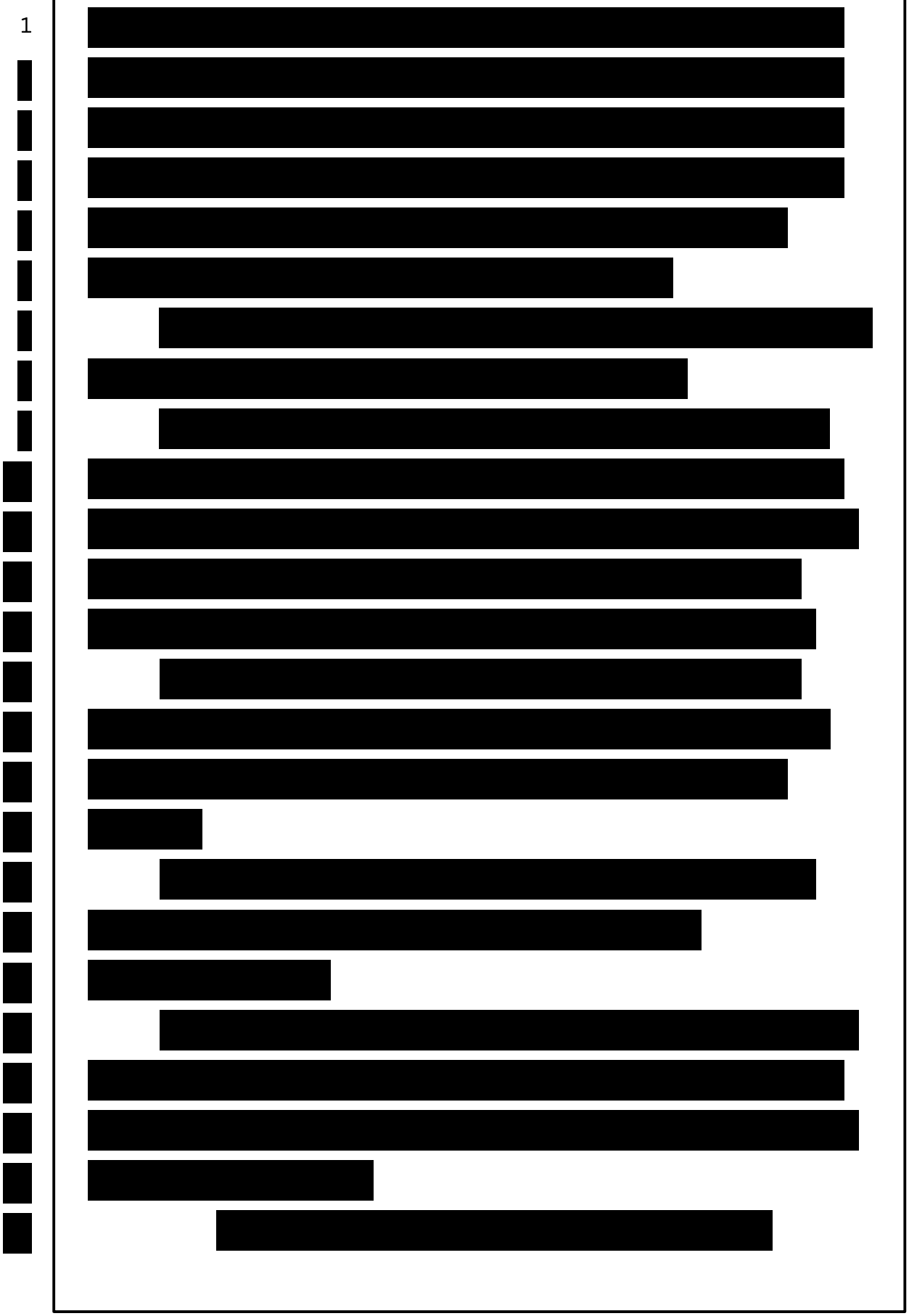












[redacted]

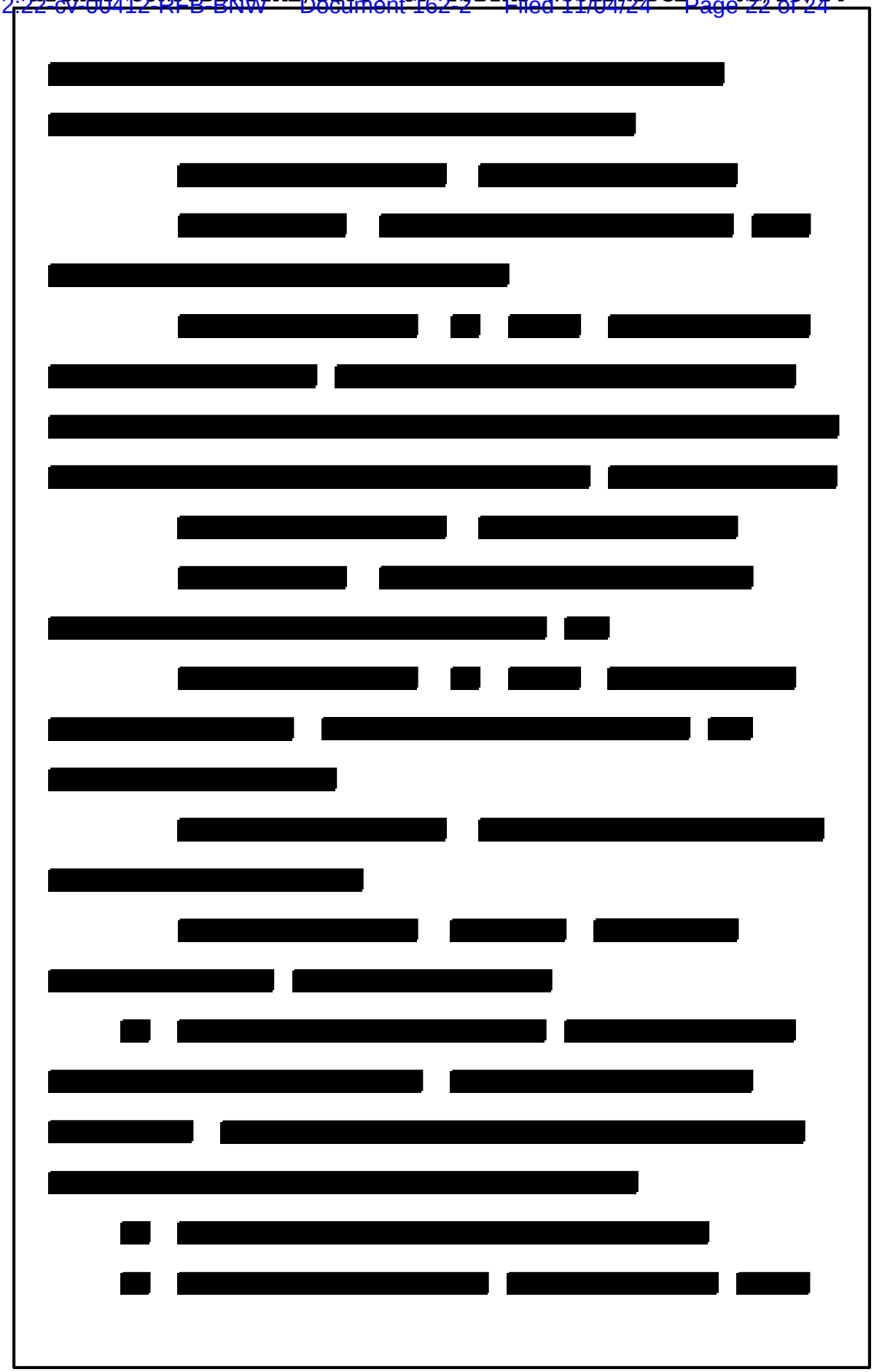
Q. I guess what I mean is Meta can use information other than -- let's see. Let me think about how to rephrase that.

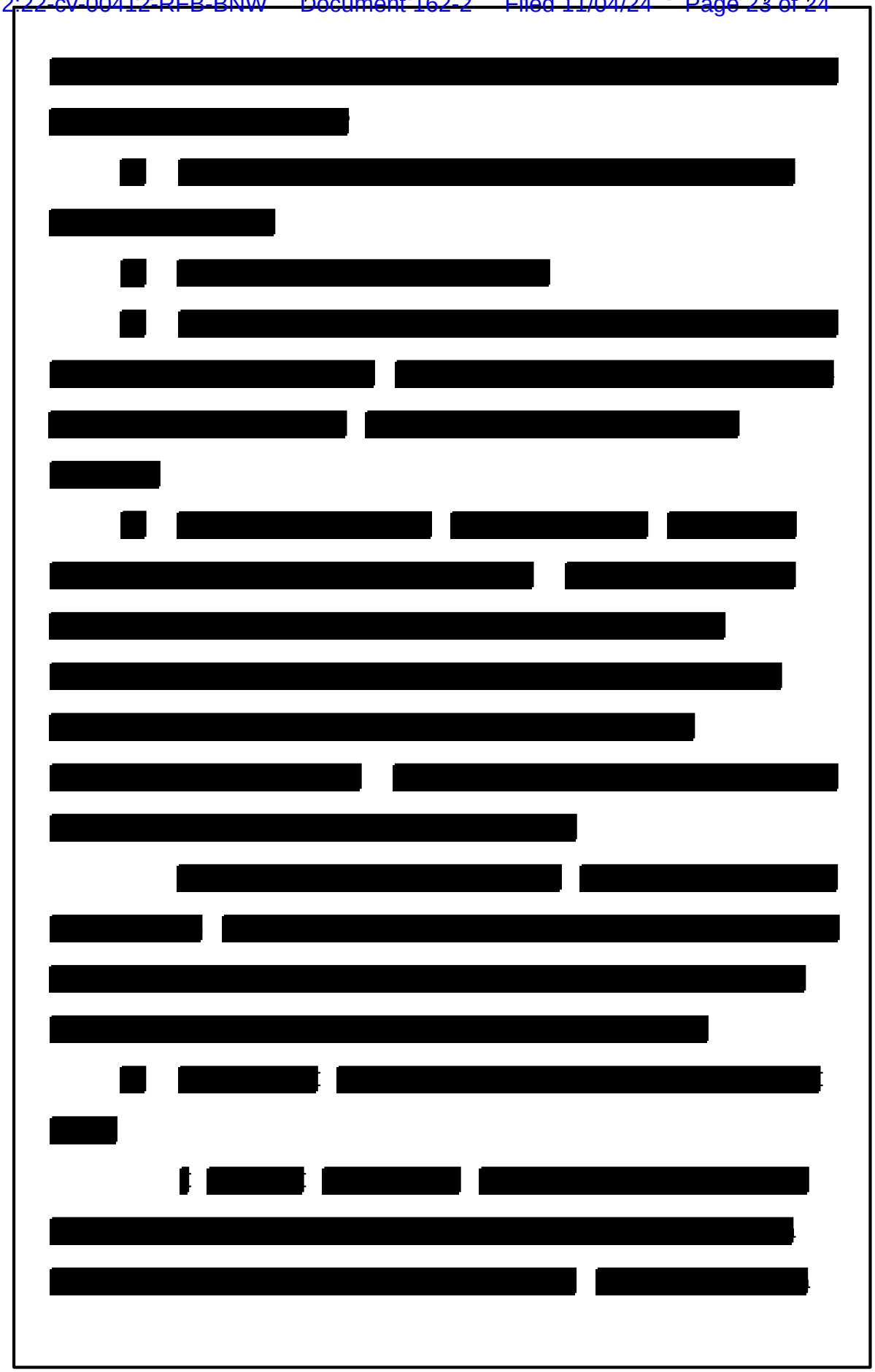
Yeah. So I guess I'm asking about focusing on the event data that's transmitted through the Meta Pixel, even if the -- I guess to start over, Meta can associate event data with a Facebook user even if that event data does not include a Facebook ID, correct?

ATTORNEY EDELSTEIN: Form.

THE WITNESS: Meta can associate data to Facebook user even if that event data was not transmitted with a Facebook user ID.

[redacted]





STATE OF CALIFORNIA)
) ss.
COUNTY OF MARIN)

I, DEBORAH FUQUA, a Certified Shorthand Reporter of the State of California, duly authorized to administer oaths pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, do hereby certify that

TOBIAS WOOLDRIDGE,

the witness in the foregoing deposition, was by me duly sworn to testify the truth, the whole truth, and nothing but the truth in the within entitled cause; that said testimony of said witness was reported by me, a disinterested person, via a web conferencing platform and was thereafter transcribed under my direction into typewriting and is a true and correct transcription of said proceedings.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, nor in any way interested in the outcome of the cause named in said caption.

Dated the 8th day of February, 2024.

DEBORAH FUQUA
CSR NO. 12948